

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

**UNITED HEALTHCARE SERVICES, INC.,)
UNITED HEALTHCARE INSURANCE)
COMPANY, and UMR, INC.,)**

Plaintiffs,)

v.)

Case No. 3:21-cv-00364

**TEAM HEALTH HOLDINGS, INC.,)
AMERITEAM SERVICES, LLC, and)
HCFS HEALTH CARE FINANCIAL)
SERVICES, LLC,)**

Defendants.)

NOTICE OF FILING EXHIBITS RELATED TO JOINT STATUS REPORT

Defendants Team Health Holdings, Inc., AmeriTeam Services, LLC, and HCFS Health Care Financial Services, LLC (collectively, “Defendants” or “TeamHealth”), respectfully give this Court Notice of Filing the accompanying exhibits, which are related to TeamHealth’s challenges to certain documents that Plaintiffs United HealthCare Services, Inc., UnitedHealthcare Insurance Company, and UMR, Inc. (collectively, “Plaintiffs”) marked as Attorneys’ Eyes Only (“AEO”) and/or redacted on confidentiality grounds. These exhibits, as explained more fully below, are intended to clarify for the Court the status of TeamHealth’s challenges as to designations and redactions, as requested in the Court’s Order (Doc. 126).

To accomplish this, TeamHealth has divided the documents into two main buckets: (1) documents that remain disputed in full, and (2) documents that Plaintiffs conceded in response to TeamHealth’s challenges, either in whole or in part, and have promised to reproduce. These two main groups have been further broken down as follows:

- Documents that remain disputed in full:
 - **Exhibit A – Disputed Administrative Services Agreements (“ASA”).**
 - **Exhibit B – Disputed Non-ASA Documents.**
- Documents that Plaintiffs have promised to reproduce:
 - **Exhibit C – Mooted Challenges.** This table lists documents that Plaintiffs both agreed to reproduce in their written responses (Doc. 107-4) and have in fact reproduced, thereby mooting TeamHealth’s challenges to the documents—in other words, these documents are no longer in dispute.
 - **Exhibit D – Inconsistent Reproductions.** This table lists documents that Plaintiffs (1) agreed to reproduce, (2) did in fact reproduce, (3) but did so in a manner that is inconsistent with the written response that Plaintiffs provided. (*See* Doc. 107-4). The entries highlighted in green are documents that, if reproduced consistent with Plaintiffs’ written responses, would no longer be in dispute. Specifically, Plaintiffs represented in their written responses that they would reproduce these documents without redactions, but the reproductions Plaintiffs provided still contain redactions. The entry highlighted in orange is a document that TeamHealth does not find objectionable as reproduced; however, Plaintiffs’ written response indicated that they intended to maintain redactions. If Plaintiffs’ reproduction correctly reflects Plaintiffs’ position (and their written response is inaccurate), TeamHealth’s challenge to this document is moot; if it does not, TeamHealth’s challenge this document will be only partially mooted.
 - **Exhibit C – Partially Mooted Challenges.** This table lists the documents that, based on Plaintiffs’ written responses, remain partially in dispute. The table notes

the remaining dispute under the “Basis for Remaining Disputes” column, which has two sub-columns, “AEO” and “Redactions.” If, for example, the parties still disagree about the propriety of the redactions in a document, there will be a “Yes” under the “Redactions” sub-column. This table also tracks the “Reproduction Status” of these documents because TeamHealth does not consider a challenge truly “mooted,” even in part, until the document has been reproduced. To the extent United has produced a particular document, it will be reflected under the “Received?” sub-column; whether the reproduction is consistent with United’s written responses is denoted under “Consistent Reproduction?” sub-column. Nevertheless, regardless of whether or when Plaintiffs provide the promised reproductions, all of the documents listed in this table will remain disputed on some other basis or bases.

TeamHealth submits this information to the Court in order to provide the most accurate possible picture of the status of TeamHealth’s challenges and Plaintiffs’ reproduction efforts. TeamHealth’s counsel has manually compiled this information by analyzing Plaintiffs’ written responses and comparing them to Plaintiffs’ reproductions; this process has been painstaking and time-consuming. Nevertheless, TeamHealth has endeavored to keep Plaintiffs apprised of its review and progress. TeamHealth first sent Plaintiffs a spreadsheet with TeamHealth’s initial analysis on Monday, April 14, 2025, and then sent an updated version—which contained the same information that TeamHealth submits to the Court today, organized in largely the same fashion — on Tuesday, April 15, 2025.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

/s/ Gary C. Shockley

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CERTIFICATE OF SERVICE

I hereby certify under Rule 5 of the Federal Rules of Civil Procedure that a true and exact copy of the foregoing **Notice of Filing** was served on the following counsel of record via operation of the Court's electronic filing system:

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Dated: April 16, 2025

/s/ Gary C. Shockley